

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FELDMAN & PINTO, P.C.,	:	Civil Action No. 11-cv-5400
Plaintiff	:	
	:	
v.	:	
	:	
MARTHA LYNN SEITHEL and	:	
SEITHEL LAW LLC,	:	
Defendants	:	

PLAINTIFF'S REQUESTS FOR THE PRODUCTION OF DOCUMENTS
BEARING ON PRELIMINARY INJUNCTION

Plaintiff Feldman & Pinto P.C., by its undersigned counsel, hereby requests that, within 30 days of service hereof, or such shorter time as the Court may permit, defendants make available for inspection and copying all requested documents at the offices of Weir & Partners LLP, The Widener Building, Suite 500, 1339 Chestnut Street, Philadelphia, PA 19107, in conformity with Fed.R.Civ.P. 34. These requests are continuing in nature and require supplemental production if additional information is obtained hereafter.

Definitions and Instructions

A. The terms "you" or "your" refer to each named defendant and every person and entity acting on behalf of any defendant.

B. The terms "document" or "documents" should be interpreted in their broadest sense, and shall be deemed to refer to preservable matter of any kind capable of being seen or heard, regardless of medium, however produced or reproduced, and all written, recorded, printed, digital, electronic or filmed copies thereof, and shall include, but not be limited to, electronically stored information and data stored on or capable of

being generated from any computer program, hardware, software, computer hard drive, network server, laptop, floppy disk, CD Rom, DVD-Rom, personal data assistant (PDA), MP3 player, cell phone, Blackberry, iPhone, iPad, flash memory card, archive media, backup tape, third party storage system, tape or other device, as well as any paper, record, invoice, writing (including draft), photograph, mechanical, digital or electronic record, e-mail message, voice mail, computer entry, metadata, letter, memorandum, note, book, newspaper, magazine, flyer, agreement, form, template, brochure, ledger, fax transmittal, cover sheet, telex, telegram, label, business card, proposal, receipt, financial statement, book of account, tax return, inter-office communication, working paper, chart, graph, envelope, index, spreadsheet, data sheet, data processing card, and any other handwritten, recorded, transcribed, printed, punched or taped matter in your possession or control, whether residing on paper, on the Internet or otherwise.

C. The term "communication" as used herein shall include any and all contact, including but not limited to in-person, mail, e-mail, voice mail, instant message, facsimile, telex, telephone or otherwise.

D. If you claim any privilege or work product protection for any communication or document, describe the parties, the date of the communication or document, its subject matter and such other information as would be necessary for the court to make a determination concerning the validity of the privilege or work product claim asserted.

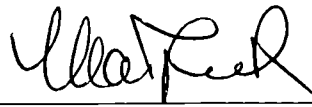
Document requests

Kindly produce:

1. Any and all documents relating to a communication with a person who was a Feldman & Pinto client as of June 13, 2011;
2. Any and all documents relating to the Dropbox account paid by Feldman & Pinto;
3. Any and all documents relating to transactions with GoDaddy.com;
4. Any and all documents relating to the registration of the domain name for SeithelLaw.com;
5. Any and all documents relating to communications with co-counsel, lead counsel or referring counsel regarding engagement of services of Lynn Seithel and/or Seithel Law LLC;
6. Any and all documents you intend to introduce at a preliminary injunction hearing;
7. Any and all documents which relate to your contention that you were promised an equity interest in Feldman & Pinto;
8. Any and all documents which relate to your contention that you were promised a fee interest in Feldman & Pinto cases;
9. Any and all telephone records of phone calls and texts made and received by you or someone on your behalf between June 1, 2011 and the date of your response hereto, relating to any person who was a Feldman & Pinto client as of June 13, 2011;
10. Any and all receipts corresponding to expenses charged to a credit card paid by Feldman & Pinto;

11. Engagement letter between you and the Spector, Gadon & Rosen firm; and
12. Engagement letter between Erika Diaz and the Spector, Gadon & Rosen firm.

WEIR & PARTNERS LLP

By: 

Marc J. Zucker, Esquire
Suite 500, The Widener Building
1339 Chestnut Street
Philadelphia, PA 19107
(215) 665-8181
(215) 665-8464 (facsimile)

Attorneys for Plaintiff Feldman & Pinto P.C.

Dated: September 27, 2011


UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FELDMAN & PINTO, P.C.,	:	Civil Action No. 11-cv-5400
Plaintiff	:	
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v.	:	
	:	
MARTHA LYNN SEITHEL and	:	
SEITHEL LAW LLC,	:	
Defendants	:	

CERTIFICATE OF SERVICE

I, Marc J. Zucker, Esquire, hereby certify that on this 27th day of September, 2011, I did cause a true and correct copy of the foregoing document to be served via e-mail and regular mail upon the following counsel:

Alan Epstein, Esq.
Jennifer Myers Chalal, Esq.
Spector Gadon & Rosen, P.C.
Seven Penn Center, 7th Floor
1635 Market Street
Philadelphia, PA 19103



Marc J. Zucker, Esquire